

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 7
	:	
ALECIA MARIE FICK,	:	CASE NO. 23-12894
	:	Judge Patricia M. Mayer
Debtor	:	Related to Document No. 33
	:	
NATIONSTAR MORTGAGE, LLC,	:	
	:	
Movant	:	
	:	
vs.	:	
	:	
ALECIA MARIE FICK AKA ALECIA	:	
MARIE BATEZEL AKA ALECIA MARIE	:	
KATZAMAN,	:	
	:	
Debtor	:	
	:	
SCOTT F. WATERMAN,	:	
	:	
Trustee	:	

RESPONSE TO MOTION FOR RELIEF FROM STAY

Debtor, Alecia Marie Fick, by and through the undersigned counsel, responds to the Motion for Relief from Stay filed by Nationstar Mortgage LLC as follows:

1. Debtor admits Nationstar Mortgage LLC is the movant.
2. Debtor admits she is the owner of the referenced property.
3. Upon information and belief, Debtor admits Nationstar Mortgage LLC is the holder of the mortgage.
4. Debtor admits Mr. Waterman is the appointed Trustee in this matter.
5. Debtor admits the filing of this bankruptcy proceeding stayed the continuation or commencement of foreclosure proceedings.
6. Debtor has encountered significant financial difficulties, rendering her unable to make the monthly post-petition mortgage payments. These challenges arose primarily from her

divorce, which occurred on March 21, 2022. The dissolution of her marriage imposed unexpected financial burdens, including legal fees and the division of assets, which severely strained her ability to fulfill her financial obligations. Debtor has made partial mortgage payments and is working to catch up on any arrearages. Considering these extenuating circumstances, Debtor respectfully requests that the automatic stay remain in place to afford her the opportunity to address her financial challenges responsibly.

7. Debtor is without sufficient information to admit or deny this allegation.

8. Debtor is without sufficient information to admit or deny this allegation as she does not know if the amount noted includes partial payments made by her during the time period noted.

9. Debtor is without sufficient information to admit or deny this allegation.

10. Debtor is without sufficient information to admit or deny this allegation.

11. Debtor requests that the automatic stay remain in effect to allow her the opportunity to address her financial challenges and explore options for repayment. Debtor is fully committed to resolving her financial obligations in a responsible manner and believes that the continuation of the automatic stay is essential to achieving this goal.

12. Debtor is without sufficient information to admit or deny this allegation.

By: /s/ Amy Ginsburg

Signature

Amy Ginsburg

Typed Name

12 Penns Trail Newtown, PA 18940

Address

855-455-7290

Phone No.

202745 PA

List Bar I.D. and State of Admission

CERTIFICATE OF SERVICE

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on February 9, 2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: electronic notification.

Office of U.S. Trustee - USTPRegion03.PH.ECF@usdoj.gov (via ECF)

Scott F. Waterman, Chapter 13 Trustee – ECFMail@ReadingCh13.com (via ECF)

Amy Ginsburg - aginsburg@recoverylawgroup.com (via ECF)

Nationstar Mortgage, LLC
MARIO J. HANYON
Brock & Scott, PLLC
wbecf@brockandscott.com (via ECF)

EXECUTED ON: 2/9/23

By: /s/ Amy Ginsburg
Signature
Amy Ginsburg
Typed Name
12 Penns Trail Newtown, PA 18940
Address
855-455-7290
Phone No.
202745 PA
List Bar I.D. and State of Admission

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KATZAMAN,	:	
	:	
Debtor	:	
	:	
SCOTT F. WATERMAN,	:	
	:	
Trustee	:	

[PROPOSED] ORDER

Upon the Motion (the "Motion") filed by Nationstar Mortgage LLC (the "Movant") for Relief from the Automatic Stay (Doc. #33) and the Debtor's Response to the Motion, and for other good cause shown therefore, it is, by the United States Bankruptcy Court for the Eastern District of Pennsylvania, hereby:

ORDERED, that the Motion be, and it is hereby, DENIED.
